



US EPA
Office of Pesticide Programs

Label Review Manual
Chapter 1 – Purpose of Manual

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Chapter 1

PURPOSE OF MANUAL**I. PURPOSE**

This Label Review Manual (LRM) serves as a training tool for Office of Pesticide Program's (OPP) employees and as guidance for product management team members who are responsible for performing label reviews. The goal of the LRM is to improve the quality and consistency of labels. In addition, this manual may be useful for state label reviewers, registrants and other individuals interested in producing readable, unambiguous pesticide labels.

It is important to note that the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA") and its implementing regulations include specific requirements for label language and format and, therefore, govern what must (and what cannot) appear on the label. Documents such as this and Pesticide Registration Notices ("PRN's") provide guidance on how the Agency interprets the applicable law.

In addition to considering the guidance provided in this manual, it is the responsibility of the label reviewer or writer to consider **all** chemical and product specific information affecting labeling such as science reviews, Federal Register Notices and Reregistration Eligibility Decision documents ("REDs").

The Agency considers this document to be an instructional aid that does not establish new guidance, but instead compiles interpretations of statutory and regulatory provisions and reiterates Agency policies. This tool is also useful in understanding approaches for how labels should generally be drafted. As always, the Agency will consider each label on its own merits and will consider deviations from Agency policy in labeling under the appropriate provisions of FIFRA and its implementing regulations.

II. APPROACH

Information in the manual is roughly arranged in the order of use by reviewers. The chapters of this manual have been numbered independently to aid future updating. Individual chapters can be updated as new policy is instituted which changes the guidance contained in a particular chapter. Each chapter will display its current issuance date.

This manual provides a systematic approach to the label review process. Most label reviews involve products that make reference to another label and which are not accompanied by data. When reviewers compare new, proposed labels to previously registered labels, the existing, registered label may have errors or be out-of-date. If the existing label has deficiencies, the proposed label may bear the

same errors. Consequently, label reviewers must not rely solely on a label-to-label comparison, but must review a label based on applicable law and guidance.

III. AVAILABILITY

The LRM is located on the Internet at: <http://www.epa.gov/oppfead1/labeling/lrm/>. A PDF is available on the Webpage for ease of printing.

IV. MAINTENANCE/UPDATE

For accurate maintenance of this manual, it is imperative that OPP staff bring to the attention of the Labeling Committee any document which affects generic labeling policy. If users at anytime come across a document or create a document that establishes labeling policy or find any discrepancies, contact a representative on the Labeling Committee or visit http://www.epa.gov/opp00001/regulating/labels/label_review.htm

The Label Review Manual Team will update the existing Chapters of the LRM on an ongoing, as needs basis. Each Chapter will maintain its own "Current as of..." date. Therefore, the documents on the Webpage will always be the most up-to-date Chapters. OPP will announce when certain Chapters have been updated.